

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: POTASH ANTITRUST LITIGATION
(II)

MDL Docket No. 1996

Case No. 08-cv-6910
(Consolidated with 08-cv-5635)

THIS DOCUMENT APPLIES TO:

The Honorable Ruben Castillo

ALL DIRECT PURCHASER ACTIONS

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
SETTLEMENT WITH THE JSC URALKALI AND JSC SILVINIT DEFENDANTS**

Direct Purchaser Plaintiffs' ("DPPs") respectfully move this Court to enter an Order for final approval of their class action settlement with defendants JSC Uralkali and the company formerly known as JSC Silvinit.

WHEREFORE, and for the reasons stated in the supporting Declarations of Bruce L. Simon and Eric Robin, filed concurrently with this Motion, the records, pleadings, and papers filed in this action, and upon such argument as may be presented to the Court at the fairness hearing, DPPs respectfully request that the Court issue an Order for final approval of the class action settlement and entry of judgment, and grant such other and further relief as this Court deems proper.

Dated: May 23, 2013

Respectfully submitted,

/s/ Steven A. Hart

Steven A. Hart #6211008

SEGAL MCCAMBRIDGE SINGER & MAHONEY

233 South Wacker Dr., Ste. 5500

Chicago, IL 60606

(312) 645-7800

shart@smsm.com

beldridge@smsm.com

eschieber@smsm.com

kpozan@smsm.com

*Direct Purchaser Plaintiffs' Interim Liaison
Counsel*

/s/ Bruce L. Simon

Bruce L. Simon
PEARSON, SIMON, WARSHAW & PENNY, LLP
44 Montgomery St., Ste. 2450
San Francisco, CA 94104
(415) 433-9000
bsimon@pswplaw.com
asheanin@pswplaw.com
tboardman@pswplaw.com

/s/ W. Joseph Bruckner

W. Joseph Bruckner
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Ave. South, Ste. 2200
Minneapolis, MN 55401
(612) 339-6900
wjbruckner@locklaw.com
hmsilton@locklaw.com
csdavis@locklaw.com
bdclark@locklaw.com

*Direct Purchaser Plaintiffs' Interim Co-Lead
Counsel*